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April 14, 2016

REDACTED FOR PUBLIC INSPECTION

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Notice of *Ex Parte* Presentation, American Teleconferencing Services, Ltd., d/b/a Premiere Global Services *Application for Review of Decision of the Wireline Competition Bureau and Request for Waiver of One-Year Downward Revision Deadline for FCC Forms 499-A*, WC Docket No. 06-122

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, American Teleconferencing Services, Ltd., d/b/a Premiere Global Services ("ATS"), a wholly owned subsidiary of Premiere Global Services, Inc. ("PGI"), by and through its undersigned counsel, submits this letter to supplement its March 3, 2016 meeting and subsequent ex parte notice to provide further information in support of ATS's Application for Review of Decision of the Wireline Competition Bureau and Request for Waiver of One-Year Downward Revision Deadline for FCC Forms 499-A ("Application for Review").¹ Specifically, this letter provides

¹ See Application for Review by American Teleconferencing Services, Ltd., d/b/a Premiere Global Services of Decision of Wireline Competition Bureau and Request for Waiver of One-Year Downward Revision Deadline for FCC Forms 499-A, WC Docket No. 06-122 (filed July 9, 2015) ("Application for Review"); Letter from Steven A. Augustino, Counsel for ATS, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 06-122 (March 7, 2016); see also *In the Matter of Universal Service Contribution Methodology, Request for Review and Waiver by American Teleconferencing Service, Ltd. d/b/a Premiere Global Services*, WC Docket No. 06-122, Order (June 9, 2015) ("ATS Waiver Order").

additional information to demonstrate (1) the timing of the availability of the new capabilities and information that led to the ministerial error on ATS's Revised 2012 FCC Form 499-A were out of ATS's control and (2) the circumstances leading to ATS's ministerial error represent a wholly unique and one-time issue that is highly unlikely to recur.

Despite prompt and persistent efforts, ATS was unable to obtain and isolate foreign-to-foreign revenue information earlier than 2013. ATS began reporting and contributing to the Universal Service Fund (“USF” or “Fund”) after the *InterCall Order* in 2008, when the Commission first required stand-alone audio-bridging providers to contribute to the Fund.

[BEGIN CONFIDENTIAL] [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[illegible]

² [BEGIN CONFIDENTIAL] [REDACTED]
[REDACTED] [END CONFIDENTIAL]

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[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [END CONFIDENTIAL] As a result, although ATS reported international and foreign-to-foreign traffic to the best of its abilities throughout the relevant time period, it only acquired the precise reporting capabilities and relevant information in late February 2013. Its March 2013 revision thus was its first opportunity to file with the new, more precise information and capabilities.

II. This Circumstances Here Are Unique and Unlikely to Recur

The circumstances leading up to the ministerial error are unique and unlikely to recur. [BEGIN CONFIDENTIAL] [REDACTED]
[REDACTED]
[REDACTED] [END CONFIDENTIAL]

Moreover, global audio-bridging presents unique challenges for contributors that make it more difficult to isolate foreign-to-foreign calls. Specifically, unlike traditional telecommunications involving only two participants, audio-bridging involves multiple participants, each of which can be located domestically or internationally, can be bridged in any location, and can be connected to different bridges that themselves are linked together. Therefore, the challenge that ATS faced to obtain the relevant jurisdictional data, analyze it, and isolate non-assessable traffic is not faced in typical Form 499 reporting situations.

Further, the circumstances here are unlikely to recur within the audio-bridging industry. The market for global audio-bridging has substantially matured since the 2008 *InterCall Order*, and providers, including ATS, have undertaken good faith efforts to comply with the Commission's contribution rules. Only a few audio-bridging providers operate globally, so few providers face the issue of identifying foreign-to-foreign audio bridging revenues. As a result, it is unlikely that another audio-bridging provider will make the same ministerial error that ATS made on its Revised 2012 FCC Form 499-A.

* * * *

Because the timing of the new capabilities and information was out of ATS's control and the underlying circumstances are unique and unlikely to recur, the Commission should grant ATS's Application for Review and allow ATS to refile its Second Revised 2012 FCC Form 499-A.

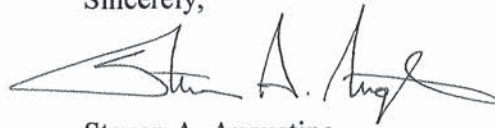
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In accordance with Section 1.1206(b)(2)(iii), this notice is timely filed.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven A. Augustino". The signature is stylized with a large, sweeping initial "S" and a distinct "A" and "Augustino" following.

Steven A. Augustino
Jameson J. Dempsey
*Counsel for American Teleconferencing
Services, Ltd. d/b/a Premiere Global Services*

cc: Chin Yoo
Carol Pomponio
Soumitra Das
Regina Brown